

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CANDACE HARPER, Individually and on :
Behalf of All Other Persons Similarly Situated, :
: Plaintiffs, : 09-cv-2254 (LDW) (ARL)
-against- :
: GOVERNMENT EMPLOYEES INSURANCE :
COMPANY a/k/a GEICO, :
: Defendant. :
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DECLARATION OF SETH R. LESSER

I, SETH R. LESSER, declare under the penalty of perjury and state as follows:

1. I am a member of the bar of this Court and a partner at Klafter Olsen & Lesser LLP, attorneys for Plaintiff Candace Harper in the above-captioned case. I submit this Declaration in Support of Plaintiff's Motion for Conditional Certification Pursuant to 29 U.S.C. § 216(b).
2. Attached to this Declaration as Exhibit A hereto is a true and accurate copy of the transcript of Candace Harper deposition taken in this matter on March 18, 2010.
3. Attached to this Declaration as Exhibit B hereto are true and accurate copies of documents produced by Defendant GEICO identified with Bates No. GEICO.00254, GEICO.00255, GEICO.00275, GEICO.00276, GEICO.00277.
4. Attached to this Declaration as Exhibit C hereto is a true and accurate copy of the transcript of John W. Pham deposition taken in this matter on March 24, 2010.
5. Attached to this Declaration as Exhibit D hereto is a true and accurate copy of the transcript of Marlene Harris-Grant deposition taken in this matter on May 3, 2010.

6. Attached to this Declaration as Exhibit E hereto is a true and accurate copy of documents that constitute the Claims Manual and the updated Chapters thereto as produced by GEICO in this matter.

Executed on July 23, 2010

/s/ Seth R. Lesser

Seth R. Lesser